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May 21, 2014

## VIA ELECTRONIC FILING

Honorable Christine M. Gravelle United States Bankruptcy Court U.S. Courthouse 402 East State Street 2<sup>nd</sup> Floor Trenton, New Jersey 08608

> Liza Price Rappaport, Debtor Re:

> > D.N.J. Ch. 11 Case No. 11-37107 CMG

Dear Judge Gravelle:

As this Court is aware, this law firm represents The Ridge at Back Brook LLC (the "Ridge"), a creditor in this bankruptcy proceeding.

We write to object to the May 2, 2014 letter submitted to Your Honor by Liza Price Rappaport. First, the letter appears to be an informal (and inappropriate) request that Your Honor "re-examine" the Debtor's Chapter 11 Reorganization Plan. If the Debtor, who is represented by counsel, wishes to seek formal review, there are well known procedures to do that. Informal letters requesting relief is not one of them.

Beyond the inappropriate procedure, we object to the Debtor's attempt to present factual statements (not under oath, not subject to cross examination, and beyond the evidence previously submitted to the Court) in an apparent effort to prejudice the interest of the Ridge. Pending before this Court is the Debtor's motion to strike the Ridge's proof of claim, and related issues. We believe that the Debtor's May 2, 2014 letter is an inappropriate and objectionable attempt to present factual evidence to the Court, which is riddled with hearsay (i.e., statements as to what a doctor's "concerns were") and other objectionable materials.

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For these reasons, we respectfully request the Court to strike the May 2, 2014 letter. Alternatively, if the Court is inclined in any way to consider that letter, we ask for permission from the Court for leave to respond.

Respectfully yours,

/s/ Brian J. Molloy BRIAN J. MOLLOY

/s/ David H. Stein DAVID H. STEIN

BJM:lk

cc: Carol Knowlton, Esq.